

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-ER

(Securities Class Action)

Hon. Eduardo Robreno

ELECTRONICALLY FILED

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR (I) PRELIMINARY APPROVAL OF
SETTLEMENTS AND (II) APPROVAL OF NOTICE TO THE CLASS**

Robert J. Kriner, Jr. (Bar No. 2546)

Vera G. Belger (Bar No. 5676)

CHIMICLES & TIKELLIS LLP

222 Delaware Avenue, 11th Floor

P.O. Box 1035

Wilmington, DE 19899

Phone: (302) 656-2500

Fax: (302) 656-9053

Liaison Counsel for the Class

Hannah Ross

Katherine M. Sinderson

Lauren McMillen Ormsbee

BERNSTEIN LITOWITZ BERGER &

GROSSMANN LLP

1251 Avenue of the Americas

New York, NY 10020

Phone: (212) 554-1400

Fax: (212) 554-1444

Maya S. Saxena

Joseph E. White, III

Brandon T. Grzandziel

Kathryn W. Weidner

SAXENA WHITE P.A.

150 E. Palmetto Park Road, Suite 600

Boca Raton, FL 33432

Telephone: (561) 394-3399

Fax: (561) 394-3382

-and -

Steven B. Singer

10 Bank Street, 8th Floor

White Plains, NY 10606

Telephone: (914) 437-8551

Fax: (888) 631-3611

*Counsel for Lead Plaintiffs and Co-Lead Counsel
for the Class*

Dated May 25, 2018

Lead Plaintiffs and Class Representatives, the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund (collectively, "Lead Plaintiffs"), hereby move this Court, pursuant to Federal Rule of Civil Procedure 23, for entry of an order: (i) preliminarily approving the proposed settlements resolving all claims asserted in this action (the "Settlements"); (ii) approving the form, content, and manner of giving notice of the proposed Settlements to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlements, approval of the Plan of Allocation, and the motion by Lead Counsel for an award of attorneys' fees and reimbursement of Litigation Expenses.

This Motion is based upon the Stipulation and Agreement of Settlement with Wilmington Trust Defendants and Underwriter Defendants dated May 15, 2018, attached hereto as Exhibit 1; the Stipulation and Agreement of Settlement with KPMG dated May 25, 2018, attached hereto as Exhibit 2; the accompanying Brief; and all other papers and proceedings herein. The parties' agreed-upon form of proposed Preliminary Approval Order, with exhibits thereto, is attached as Exhibit 3 to this Motion. Pursuant to the terms of the Stipulations, this Motion is unopposed by Defendants.

Dated: May 25, 2018

Respectfully submitted,

CHIMICLES & TIKELLIS LLP

/s/ Robert J. Kriner, Jr.

Robert J. Kriner, Jr. (Bar No. 2546)
Vera G. Belger (Bar No. 5676)
222 Delaware Avenue, 11th Floor
P.O. Box 1035
Wilmington, DE 19899
Phone: (302) 656-2500
Fax: (302) 656-9053

Liaison Counsel for the Class

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

Hannah Ross
Katherine M. Sinderson
Lauren McMillen Ormsbee
1251 Avenue of the Americas
New York, NY 10020
Phone: (212) 554-1400
Fax: (212) 554-1444

SAXENA WHITE P.A.

Maya S. Saxena
Joseph E. White, III
Brandon T. Grzandziel
Kathryn W. Weidner
150 E. Palmetto Park Road, Suite 600
Boca Raton, FL 33432
Telephone: (561) 394-3399
Fax: (561) 394-3382

-and -

Steven B. Singer
10 Bank Street, 8th Floor
White Plains, NY 10606
Telephone: (914) 437-8551
Fax: (888) 631-3611

*Counsel for Lead Plaintiffs and Co-Lead
Counsel for the Class*